



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Melissa Ann Santana,
Defendant.

CR-17-08284-PCT-GMS(DKD)

INDICTMENT

VIO: 18 U.S.C. § 1001(a)(2)
(Makes any materially false, fictitious,
or fraudulent statement or
representation)
Counts 1 - 3

18 U.S.C. §§ 2261A(2) & 2261(b)
(Stalking)
Counts 4 - 8

THE GRAND JURY CHARGES:

At all times material to this indictment, within the District of Arizona and elsewhere:

COUNT 1

On or about September 9, 2016, in Coconino County, in the District of Arizona, the defendant, MELISSA ANN SANTANA, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false statement and representation, in that MELISSA ANN SANTANA, did falsely represent to three federal officials of the United States Forest Service, W.K., A.P. and G.O., all Flagstaff Hotshot Crew supervisors, that she had a teenage daughter who was sexually assaulted by Arizona based federal firefighters while fighting a fire in Wyoming, when in fact she created a false e-mail identity, does not live in Wyoming, does not have a daughter and no such assault took place.

In violation of Title 18, United States Code, Section 1001(a)(2).

1 **COUNT 2**

2 On or about September 29, 2016, in Coconino County, in the District of Arizona,
3 the defendant, MELISSA ANN SANTANA, in a matter within the jurisdiction of the
4 executive branch of the Government of the United States, did knowingly and willfully
5 make a materially false statement and representation, in that MELISSA ANN
6 SANTANA, did falsely represent to a federal official of the United States Forest
7 Service, Globe Hotshot Crew Superintendent D.W., that she was a woman who a
8 firefighter had impregnated and that he wasn't returning her calls, when in fact she
9 created a false identity and had no relationship with the firefighter.

10 In violation of Title 18, United States Code, Section 1001(a)(2).

11 **COUNT 3**

12 On or about September 29, 2016, in Coconino County, in the District of Arizona,
13 the defendant, MELISSA ANN SANTANA, in a matter within the jurisdiction of the
14 executive branch of the Government of the United States, did knowingly and willfully
15 make a materially false statement and representation, in that MELISSA ANN
16 SANTANA, did falsely represent to a federal official of the United States Forest
17 Service, Flagstaff Hotshot Crew Superintendent W.K., that she was a woman who a
18 firefighter had impregnated and that he wasn't returning her calls, when in fact she
19 created a false identity and had no relationship with the firefighter.

20 In violation of Title 18, United States Code, Section 1001(a)(2).

21 **COUNT 4**

22 Between on or about February 1, 2015 and February 8, 2017, in the District of
23 Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass or
24 intimidate M.G., used facilities of interstate and foreign commerce, to-wit, interactive
25 computer services, electronic communication systems of interstate commerce or any
26 other facility of interstate or foreign commerce to engage in a course of conduct that
27 caused, attempted to cause or would reasonably have been expected to cause substantial
28 emotional distress to M.G.

1 In violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

2 **COUNT 5**

3 Between on or about June 30, 2016 and August 1, 2017, in the District of
4 Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass,
5 intimidate or place under surveillance with the intent to harass or intimidate N.L., used
6 facilities of interstate and foreign commerce, to-wit, interactive computer services,
7 electronic communication systems of interstate commerce or any other facility of
8 interstate or foreign commerce to engage in a course of conduct that caused, attempted
9 to cause or would reasonably have been expected to cause substantial emotional distress
10 to N.L.

11 In violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

12 **COUNT 6**

13 Between on or about August 31, 2016 and September 22, 2017, in the District
14 of Arizona, the defendant, MELISSA ANN SANTANA ,with the intent to harass or
15 intimidate K.T., used facilities of interstate and foreign commerce, to-wit, interactive
16 computer services, electronic communication systems of interstate commerce or any
17 other facility of interstate or foreign commerce to engage in a course of conduct that
18 caused, attempted to cause or would reasonably have been expected to cause substantial
19 emotional distress to K.T.

20 In violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

21 **COUNT 7**

22 Between on or about September 8, 2016 and May 26, 2017, in the District of
23 Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass or
24 intimidate E.T., used facilities of interstate and foreign commerce, to-wit, interactive
25 computer services, electronic communication systems of interstate commerce or any
26 other facility of interstate or foreign commerce to engage in a course of conduct that
27 caused, attempted to cause or would reasonably have been expected to cause substantial
28 emotional distress to E.T.

1 In violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

2 **COUNT 8**

3 Between on or about January 24, 2017 and March 1, 2017, in the District of
4 Arizona, the defendant, MELISSA ANN SANTANA, with the intent to harass or
5 intimidate D.S., used facilities of interstate and foreign commerce, to-wit, interactive
6 computer services, electronic communication systems of interstate commerce or any
7 other facility of interstate or foreign commerce to engage in a course of conduct that
8 caused, attempted to cause or would reasonably have been expected to cause substantial
9 emotional distress to D.S. and members of D.S.'s immediate family.

10 In violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

11 A TRUE BILL

12
13
14 s/
FOREPERSON OF THE GRAND JURY
Date: November 14, 2017

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16 ELIZABETH A. STRANGE
17 Acting United States Attorney
District of Arizona

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19 s/
20 CAMILLE D. BIBLES
Assistant U.S. Attorney